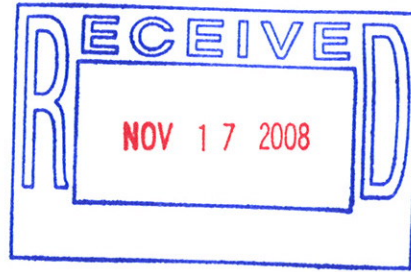




U.S. Highway 431 North
P.O. Box 3000
Russellville, Kentucky 42276
Telephone 502-755-6000



November 13, 2008

Ms. Sara Beard
Kentucky Department for Environmental Protection
Division of Water
200 Fair Oaks Lane
Frankfort, KY 40601

Re: KPDES Permit No. KY0072630

Dear Sara:

Per my recent e-mail correspondence of Oct. 28, 2008, please find enclosed the Form C-11, Attachment B, for Outfall 004. This form reflects the changes to our system that have greatly reduced our discharge volumes to Austin Creek. These changes were implemented after the renewal application was submitted in October 2007. Section IV. B has also been revised and included with this letter to reflect changes in the water pollution control projects that we have pursued.

In addition, we have 2007 – 2008 production data available that could impact the calculations of the technology-based limits for Outfall 004, which I would like to review with you before the draft permit is finalized.

We look forward to working with the Division of Water in the near future to obtain a new permit that accurately reflects the operations at Logan Aluminum, Inc. If any questions arise regarding this information, please contact me at (270) 755-6146.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Haury".

Laura Haury
Environmental Engineer

ATTACHMENT B: KPDES FORM C-11 REVISED 11/5/08
FLows, SOURCES OF POLLUTION, & TREATMENT TECHNOLOGIES-SECTION B

Outfall No. (List)	Operation (List)	Average Flow	Description – Reduction	List Codes from Table C-1	
004	Backwash from raw water filters (50k gpd)	250,000 gpd	Rpl'd Media & Freq of Back Wash	X	X
	Backwash from Potable Coal Filters (0) gpd	5,000 gpd	Shut Down Potable Filter	X	X
	Backwash from Activated Carbon Filter & De-mineralized water unit (36,000 gpd)	25,800 gpd	Rpr'd 40k gpd Demin Leak	X	X
	Plant Cooling Water (80k gpd)	100,000 gpd	Rpr'd Leaks - IAF	X	X
	Caster Cooling Water (135k gpd)	300,000 gpd	Chg'd Water Chemistry and Conductivity Target	X	X
	Water from belt press (10k gpd)	10,000 gpd	Drum Skim plus Induced Air Floatation Conservation	X	X
	Return Water from Coating Lines (40k gpd)	78,000 gpd	Conservation – Re-circulate Clarify & Neutralize	2 2 1	D K U
	Water from Industrial Waste System (100k gpd)	100,200 gpd	No Reduction - Oil Removal	X	X
	Misc Contributions (10k gpd)	25,000 gpd	Conservation - None		
	Evaporation (88,800 gpd)		Spray Fields		
Estimated SW Contributions	Landfill Leachate Return	50 gpd	Aeration	3	E
Surface areas	Landfill Stormwater Runoff	19,000 gpd	Sedimentation	1	U
Attached	Sludge Drying Bed		Sludge De-watering	5	H
	Stormwater to Wetlands	300,000 gpd	Sedimentation	1	U
	Total	1,213,050 gpd incl. stormwater estimated contribution			
	Revised Total	691,250 gpd	Approximately a 521,800 gpd Reduction in process water		

IV. B - Improvements

Planned water pollution control projects – Revised 11/10/08

004 Discharge

Since the construction of the wetlands, the flow of waste water has increased to an average of 0.893 MGD in 2006. This level of production has taxed the wetlands system, now operating at maximum capacity. Heavy rainfall in the wetlands basins can double or triple the daily volume flowing out the 004 outfall resulting in exceedances of the KPDES permit at median TSS and O&G concentrations.

Three capital projects are underway to improve the discharge conditions of 004.

- 1) Addition of a surge basin and weir level control will provide some buffer to reduce daily peak volumes. An additional basin next to the last basin of the wetlands is under survey. This basin will allow us regulate the discharge flow during high rain events.
- 2) Increased production demands in the rolling mills have resulted in increased oily wastewater loadings through the Industrial Waste System. The existing waste water treatment process is not capable of removing all O&G during periods of increased flows and concentrations. The higher loading produces elevated levels of O&G in the Tank Farm "Off Water" which discharges into the process pond increasing the O&G concentrations in the 004 Outfall. A membrane filtration unit ~~nutshell filtration unit~~ will be installed at the bulk tank farm in 2009 to manage the removal of oils from our waste waters prior to the release to the wetlands overland spray fields. This filtration unit will remove 99.9% of O&G from the tank farm discharge.
- 3) The TSS issue at 004 is mainly due to plant life attrition and algae that produce very small organic fragments in the Wetlands basins which pass through the 004 outfall. The wetlands basins have been ~~completely de-sludged and renovated~~ A vibratory screen which removes approximately 45% of TSS will be added in 2008 to reduce TSS from the discharge. ~~As an intermediate, Logan has installed a rental unit which removes solids before discharge.~~ The wetlands will be maintained at lower levels to perform as a better filtration system.

These projects will be completed in a sequence which will provide the most effective results and will be re-evaluated in a phased approach.